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9 Attorneys for Defendants Rural/Metro Fire Dept., Inc.,
10 Grant Reed and Brittany Reed

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 Robert Steven Cutler, individually and as
14 Administrator of the Estate of David A. Cutler,
15 deceased, on behalf of himself and on behalf of
16 all beneficiaries of the Estate of David A.
Cutler, deceased, and Renee Luddington Cutler,

17 Plaintiffs,

18 vs.
19

20 Mark D. Napier, Sheriff of Pima County,
21 Arizona, in his official capacity; Rural/Metro
22 Fire Dept., Inc., an Arizona for profit
corporation, Keith Barnes and Jane Doe Barnes,
his spouse, Grand Reed and Brittany Reed,

23 Defendants.
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No. 18-CV-00383-TUC-FRZ

**DEFENDANTS RURAL/METRO
FIRE DEPT., INC., GRANT REED
AND BRITTANY REED'S
STATEMENT OF FACTS IN
SUPPORT OF THEIR MOTION
FOR SUMMARY JUDGMENT RE:
NEGLIGENCE CLAIM – TAYLOR
EXPERT TESTIMONY
PRECLUSION**

**(Assigned to the Honorable
Frank R. Zapata)**

1 Defendants, Rural/Metro First Dept., Inc., Grant and Brittany Reed (collectively
2 “RM”), respectfully submit this Statement of Facts in support of their Motion for
3 Summary Judgment RE: Negligence Claim – Taylor Expert Testimony Preclusion.

4 **STATEMENT OF FACTS**

5 1. Roy Taylor was employed by Plaintiff as a police procedures expert. *See*
6 **Exhibit A**, Roy Taylor, Ph.D.’s Expert Report (Taylor000001-000029).

7 2. Although Roy Taylor worked as an EMT (not as a certified paramedic), that
8 employment ended in 2010, several years before the incident in this case. *Id.*

9 3. Roy Taylor is not certified as an EMCT-Paramedic, has no experience as a
10 paramedic, does not actively practice as an EMCT-Paramedic, and does not instruct
11 paramedic students. *Id.*

12 4. With respect to Roy Taylor’s experience as an EMT, he admits that his
13 employment as an EMT ended in 2010. *Id.*

14 5. Roy Taylor also admits that he has never been licensed or certified as a
15 paramedic and never been qualified as an expert to testify as to a paramedic’s standard of
16 care. *See Exhibit B*, Deposition of Roy Taylor, Ph.D., p. 117, lns. 13-21.

17 6. Defendant Grant Reed is a certified EMCT – Paramedic. *See Exhibit C*,
18 Grant Reed’s EMCT – Paramedic Certification Cards (CONFIDENTIAL CUTLER/RM
19 0693-0694).

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1 RESPECTFULLY SUBMITTED this 3rd day of September, 2020.

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3 SATTERLEE GIBBS PLLC

4
5 By: /s/ Scott Reynolds

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12 Dept., Inc., Grant Reed and Brittany Reed

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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By: /s/ Kirsten Sylvia